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11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 UNITED STATES OF AMERICA,
14 Plaintiff,

15 vs.

16 DAVID STEPHEN BANGS II,
17 Defendant.

18 CASE NO.: 2:20-CR-00006-001-GMN-NJK

19 STIPULATION TO CONTINUE TIME FOR
20 SENTENCING

21 **STIPULATION TO CONTINUE TIME FOR SENTENCING**

22 IT IS HEREBY STIPULATED AND AGREED by and between Jeremy Stanton Robbins,
23 Special Assistant United States Attorney, Counsel for UNITED STATES OF AMERICA, and
24 Maysoun Fletcher, Esq., Counsel for Defendant DAVID STEPHEN BANGS II, that the Sentencing
25 Hearing currently scheduled for May 26, 2020 at 4:00 p.m. be vacated and reset to July 8, 2020 at
26 10:00 a.m.

27 This Stipulation is entered into for the following reasons:

28 1. In-Person Sentencing Hearing appearances are currently limited due to the Covid-19
pandemic. The Court's next available in -person hearing is May 27, 2020, however, Counsel for the
United States is unavailable on that date.

29 2. Counsel for the United States must travel from another State for the hearing and will
need time to make travel arrangements once the Court has resumed in person appearances.

30 3. Mr. Bangs is out of custody on pre-trial release and has no objection to the request for
continuance, after speaking with his counsel.

1 4. Counsel for the United States has no objection to the continuance.

2 5. Denial of this request for continuance could result in a miscarriage of justice.

3 6. The additional time requested by this stipulation is excludable in computing the time
4 within which trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States
5 Code, Section 3161 (h)(1)(D) and Title 18, United States Code Section 3161 (h)(7)(A) considering
6 the factors in Title 18, United States Code, Sections 3161 (h)(7)(B)(I) and 3161 (h)(7)(B)(iv).

7 7. For all the above-stated reasons, the ends of justice would best be served by a
8 continuance of the current Sentencing Hearing.

9
10 This is the first request for continuance filed herein.

11 DATED: May 19, 2020.

12
13 _____
14 */s/ Jeremy Stanton Robbins*
15 **Jeremy Stanton Robbins, Esq.**
16 Special Assistant United States Attorney
17 400 South Virginia Street
18 Reno, Nevada 89501

19
20 _____
21 */s/ Maysoun Fletcher*
22 **Maysoun Fletcher, Esq.**
23 5510 South Fort Apache Road
24 Las Vegas, Nevada 89148
25 Attorney for Defendant, David Bangs, II.

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11 **UNITED STATES DISTRICT COURT**

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13 UNITED STATES OF AMERICA,
14 Plaintiff,
15 vs.
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21 **FINDINGS OF FACT**

22 Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court
23 finds:

24 This Stipulation is entered into for the following reasons:

25 1. In-Person Sentencing Hearing appearances are currently limited due to the Covid-19
26 pandemic. The Court's next available in -person hearing is May 27, 2020, however, Counsel for the
27 United States is unavailable on that date.

28 2. Counsel for the United States must travel from another State for the hearing and will
need time to make travel arrangements once the Court has resumed in person appearances.

3. Mr. Bangs is out of custody on pre-trial release and has no objection to the request for
continuance, after speaking with his counsel.

4. Counsel for the United States has no objection to the continuance.

5. Denial of this request for continuance could result in a miscarriage of justice.

6. The additional time requested by this stipulation is excludable in computing the time within which trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161 (h)(1)(D) and Title 18, United States Code Section 3161 (h)(7)(A) considering the factors in Title 18, United States Code, Sections 3161 (h)(7)(B)(I) and 3161 (h)(7)(B)(iv).

7. For all the above-stated reasons, the ends of justice would best be served by a continuance of the current Sentencing Hearing.

CONCLUSIONS OF LAW

Denial of this request for continuance could result in a miscarriage of justice.

ORDER

IT IS HEREBY ORDERED that the Sentencing Hearing currently scheduled for May 26, 2020 at 4:00 p.m., is continued to the 8th day of July, 2020, at 10:00 a.m. in Courtroom 7D before Judge Gloria M. Navarro.

IT IS SO ORDERED.

DATED this 20 day of May , 2020.


HONORABLE GLORIA M. NAVARRO
U.S. DISTRICT COURT JUDGE